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 12 Administration in its capacity as Receiver for Rocket
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17 Attorney for Defendants
 18 Fred Cucchi, Alberto Gandini, Michele Liberato, Valor Life
 (Vaduz/Lichtenstein), Yves Derville, Philippe Gire, Jean-
 19 Claude Guez, Michael Roujansky, Michel Saunier, Patrice
 Vinet, Nigel Backwith, Ajmair Singh Bhullar, Peter Ayrton
 20 Cheese, The Reverend Canon Joseph Hawes and Mr.
 Christopher Eyden, Alan John Healey, Justine Lumb,
 21 Gregory Charles Meekings, Andrew Middleton

22 UNITED STATES DISTRICT COURT

23 NORTHERN DISTRICT OF CALIFORNIA

24 SAN FRANCISCO DIVISION

25 United States Small Business Administration in
 26 its capacity as Receiver for Rocket Ventures II
 SBIC, L.P.,

Case No.: CV-10-4425 JSW

27 Plaintiff,

28 **CAPTION CONTINUED ON NEXT PAGE**

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vs.

Case No.: CV-10-4425 JSW

Rocket Ventures II, L.P., a California limited partnership; Rocket Ventures II CEO Fund, L.P., a California limited partnership; Rocket Ventures SBIC Partners, LLC, a Delaware limited liability company; Cordusio Societa Fiduciaria Per Azioni Lozia Federico; Kenneth W. & Melissa Baldwin; Paul Cantwell; Peter Ayrton Cheese; Yves Derville; Richard S. Cuccioli; Alistair Anderson Donald; Philippe Gire; Jean-Claude Guez; Joseph Hawes & Christopher Eyden; Alan John Healey; Craig Foster Heimark; David E. Kropp; Gregory Charles Meekings; Michele Liberato; Fred Cucchi; ValorLife; Alberto Gandini; Rijete Pty. Ltd.; Christopher Stainton; Tyna Development; Thomas Tynan; Patrice Vinet; Hahei Limited; Michel Saunier; Michel Roujansky; Nigel Backwith; Justine Lumb; Andrew Middleton; Ajmair Singh Bhullar; Estate of Grant A. Dove; Luca Casiraghi; David Mather,

Defendants.

STIPULATION BETWEEN PLAINTIFF RECEIVER AND DEFENDANTS FRED CUCCHI, ALBERTO GANDINI, MICHELE LIBERATO, VALOR LIFE (VADUZ/LICHTENSTEIN), YVES DERVILLE, PHILIPPE GIRE, JEAN-CLAUDE GUEZ, MICHAEL ROUJANSKY, MICHEL SAUNIER, PATRICE VINET, NIGEL BACKWITH, AJMAIR SINGH BHULLAR, PETER AYRTON CHEESE, THE REVEREND CANON JOSEPH HAWES AND MR. CHRISTOPHER EYDEN, ALAN JOHN HEALEY, JUSTINE LUMB, GREGORY CHARLES MEEKINGS, ANDREW MIDDLETON FOR ADDITIONAL THIRTY DAYS TO RESPOND TO AMENDED COMPLAINT; ~~[PROPOSED]~~ ORDER

Plaintiff United States Small Business Administration in its capacity as Receiver for Rocket Ventures II SBIC, L.P., ("Plaintiff Receiver") and newly added Defendants Fred Cucchi, Alberto Gandini, Michele Liberato, Valor Life (Vaduz/Lichtenstein), Yves Derville, Philippe Gire, Jean-Claude Guez, Michael Roujansky, Michel Saunier, Patrice Vinet, Nigel Backwith, Ajmair Singh Bhullar, Peter Ayrton Cheese, The Reverend Canon Joseph Hawes and Mr. Christopher Eyden, Alan John Healey, Justine Lumb, Gregory Charles Meekings, Andrew Middleton, (the "Newly Named European Defendants")¹, by and through their respective counsel of record, hereby stipulate and agree as follows:

WHEREAS,

Plaintiff Receiver filed an Amended Complaint on January 18, 2012; and,

¹ By filing an Appearance and entering this Stipulation, the Newly Named European Defendants do not waive any potential objections to personal jurisdiction or service of process.

The time previously set for newly named parties to respond to the Amended Complaint has been ordered to be on or before March 21, 2012; and,

The Parties subsequently entered a stipulation extending the date to respond to the Amended Complaint to be on or before April 12, 2012; and,

The Newly Named European Defendants submitted a settlement proposal to the Plaintiff Receiver on March 12, 2012 (the "Settlement Proposal"); and,

The Plaintiff has reviewed the Settlement Proposal and is preparing a response; and,

The Parties request an additional 30 days for the Newly Named European Defendants to respond, in order to give the Plaintiff enough time to prepare a response and for the Parties to fully explore the possibility of settlement;

NOW, THEREFORE,

The Plaintiff Receiver and the Newly Named European Defendants hereby agree that the time for the Newly Named European Defendants to respond to the Amended Complaint shall be extended thirty days and the Newly Named European Defendants shall have up to, and including, May 14, 2012 to answer, move, or otherwise respond to the Amended Complaint.

IT IS SO STIPULATED:

Dated: April 11, 2012

SCHNADER HARRISON SEGAL & LEWIS LLP

By: /s/ T. Scott Tate

T. Scott Tate
Attorneys for Plaintiff
United States Small Business
Administration in Its Capacity as Receiver
for Rocket Ventures II SBIC, L.P.

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1 Dated: April 11, 2012

DEWEY & LEBOEUF LLP

3 By: /s/ Diana Hughes

4 Diana Hughes
Attorney for Defendants

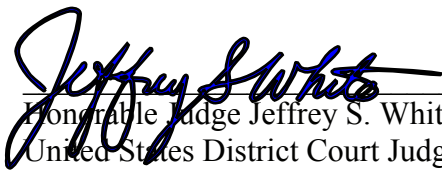
5 Fred Cucchi, Alberto Gandini, Michele
6 Liberato, Valor Life (Vaduz/Lichtenstein),
7 Yves Derville, Philippe Gire, Jean-Claude
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9 Patrice Vinet, Nigel Backwith, Ajmair Singh
10 Bhullar, Peter Ayrton Cheese, The Reverend
11 Canon Joseph Hawes and Mr. Christopher
Eyden, Alan John Healey, Justine Lumb,
Gregory Charles Meekings, Andrew
Middleton

12 *Pursuant to General Order No. 45 § X.B., the*
13 *filer attests that concurrence in the filing of*
14 *this document has been obtained from the*
15 *above signatory.*

16 **PROPOSED ORDER**

17 Pursuant to stipulation, IT IS SO ORDERED:

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19
20 Dated: APRIL 13, 2012

21 
Honorable Judge Jeffrey S. White
United States District Court Judge
Northern District of California

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